

SEALED

**AFFIDAVIT IN SUPPORT OF AN APPLICATION
FOR A SEARCH WARRANT**

I, Terrance L. Taylor, being first duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (“HSI”). I have been so employed since March 2012. I am currently assigned to the Office of the Resident Agent in Charge HSI Charleston, West Virginia. I have experience in conducting investigations involving computers and the procedures that are necessary to retrieve, collect, and preserve electronic evidence. Through my training and experience, including on-the-job discussions with other law enforcement agents and cooperating suspects, I am familiar with the operational techniques and organizational structure of child pornography distribution networks and child pornography possessors and their use of computers and other media devices.

2. Prior to my employment with HSI, I was a Police Officer for two years in Huntington, West Virginia, a Special Agent with the United States Department of State-Bureau of Diplomatic Security for six years, a Special Agent with the Naval Criminal Investigative Service for two years, and a Special Agent with the United States Department of State-Office of Inspector General for two years. I am a graduate of three federal law enforcement academies at the Federal Law Enforcement Training Center (“FLETC”) and a graduate of the West Virginia State Police Academy. I graduated from the Criminal Investigator Training Program in 2002, and the Immigration and Customs Enforcement Special Agent Training Program in 2012. As part of

these programs, I received extensive training in the areas of law within the jurisdiction of HSI. I have specifically received training in the areas of child pornography and the sexual exploitation and abuse of children. This training includes specialized instruction on how to conduct criminal investigations related to violations of child protection laws pursuant to Title 18, United States Code, Sections 2251, 2252, 2252A, and 2256.

3. As a Special Agent, I have investigated federal criminal violations related to high technology or cybercrime, child exploitation, and child pornography. I have gained experience through training at the FLETC, Immigration and Customs Enforcement, as well as everyday work relating to investigations involving the receipt, possession, access with intent to view, production, importation, advertising, and distribution of child pornography that occur in the Southern District of West Virginia. I have received training in the areas of child pornography and child exploitation, and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media, including computer media. I have obtained search warrants for child pornography offenses, and I have been the case agent or assisted others in numerous investigations involving the sexual exploitation of children. Moreover, I am a federal law enforcement officer who is engaged in enforcing the criminal laws, including 18 U.S.C. §§ 2252A(a)(2) (receipt or distribution of child pornography), and 2252A(a)(5)(B) (possession of child pornography), and I am authorized by law to request a search warrant.

4. I make this affidavit in support of an application for a search warrant for information associated with certain accounts that are stored at premises owned, maintained, controlled, or operated by Quora, Inc. (“Quora”), an electronic communications service and/or remote computing service provider headquartered at 650 Castro Street, Mountain View, CA

94041. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require Quora to disclose to the government copies of the information (including the content of communications) further described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

5. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

6. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. §§ 2251 (production of child pornography), 2252A (transport, receipt, distribution, possession, and access with intent to view child pornography), and 2422(b) (enticement of a minor) (collectively, the “Subject Offenses”) have been committed by TODD CHRISTOPHER ROATSEY (“ROATSEY”). There is also probable cause to search the information described in Attachment A for evidence, contraband, and/or fruits of these crimes further described in Attachment B.

BACKGROUND ON QUORA

7. Quora is a website and mobile application that allows users to post questions and receive answers from other users. Users can interact through comments in the answers to these questions. Users can also “upvote” answers to questions, indicating that the user finds the answer helpful or otherwise finds the answer worthy of promotion.

8. Quora users can also create and follow “Spaces,” which involve content relating to a specific interest or subject. Spaces can be used for a small group of users to curate content on a particular topic, by an individual for personal organization of their content, or by a large community to have shared conversations. Users can opt to follow particular Spaces that relate to topics of interest. Users can also interact with posts, ask questions, and engage in other conversations within a Space, depending on what types of content are permitted by the owners or moderators of that particular Space. A particular user can also be blocked from participating in a Space, although even a blocked user can continue to follow the Space.

9. Quora also has Topics, which are labels that can be applied to questions or posts to describe the subject of the question or post. Users can follow a certain Topic in order to receive content related to the Topic.

10. Quora has the Messages feature, which allows users to directly communicate with each other.

11. Users on Quora can block other users. A blocked user cannot follow or subscribe to the user who has blocked them, send messages to that user, or comment on answers by that user,

12. Bookmarks on Quora allows users to save content so that they can quickly access that content.

13. Quora users can also create a profile on Quora. Users select a username and can post a profile picture that is shared with others. A user’s profile can also include “credentials and highlights,” which can include information such as where a user lives, what schools they attended, and any particular areas of expertise they may have. Credentials can also be included with the

user's name on individual answers they post in order to identify their basis of knowledge or particular expertise for providing their answer.

PROBABLE CAUSE

14. On or about August 22, 2021, MediaLab/Kik submitted CyberTip Report 98779073 to the NCMEC CyberTipline. The CyberTip Report was the result of MediaLab/Kik representatives reporting to NCMEC that a Kik profile bearing the username "jsparrow2174" had uploaded eight (8) videos and one (1) image through Kik Messenger. Kik representatives viewed the aforementioned files and found them to contain depictions of prepubescent and pubescent minors engaged in sexual activity. Kik representatives advised the aforementioned files were sent from "jsparrow2174."

15. On or about September 16, 2021, HSI Charleston issued an administrative subpoena/summons to Suddenlink Communications regarding subscriber information pertaining to the IP address identified in the CyberTip Report. The information provided by Suddenlink indicated that the IP address was assigned to the Elkview, Kanawha County, West Virginia residence owned by Todd Christopher ROATSEY.

16. On October 27, 2021, a federal search warrant was obtained to search the Elkview residence belonging to ROATSEY. The search warrant was executed on October 28, 2021. During the execution of the search warrant, numerous electronic devices were seized.

17. Many of the devices seized have been forensically reviewed. The review of one such device, a Samsung Android cell phone seized from ROATSEY at the time of the search, and the microSD card contained therein, (collectively, "the Phone"), revealed evidence that the email

address gilliganisland142@gmail.com had been accessed on the Phone. Some content from the email account for gilliganisland142@gmail.com was recovered from the Phone.

18. Within the emails for the email account gilliganisland142@gmail.com were numerous emails from Quora Spaces received between March 24, 2021 and October 23, 2021 (five days before the Phone was seized from ROATSEY's house on October 28, 2021). This is not necessarily the entire scope of messages received from Quora by ROATSEY; a cell phone only retains a limited number of emails on the phone itself that can be recovered through a forensic examination of the device.

19. The particular Spaces from which ROATSEY received emails were named My~Teen~Chats, Teen Matchmaking Hangout, and Independent Baddies. The Quora Space for My~Teen~Chats (available at <https://myteenchats.quora.com/>) includes as its description: "TEEN CHATS- teen experiences, dating, middle school/ highschool, ONLY TEENS!!!" The Quora Space for Teen Matchmaking Hangout (available at <https://teenmatchmakinghangout.quora.com/>) includes as its description: "A place for teens to make friends, find a match, or talk about anything!" The Quora Space for Independent Baddies (available at <https://independentbaddies.quora.com/>) indicates it is intended for users ages 18 and under.

20. The emails appear to be notifications for specific posts added to the particular Space. For example, an email from My~Teen~Chats on March 30, 2021, contains a question posted in the Space: "I am 14 and he is 20. I have a crush on a 20-year-old boy. We also kissed. Is there too much age difference for you?" An email from Teen Matchmaking Hangout sent a post stating, "looking for a bf or gf im 13 my name is Adara and here is some pics of me p.s i am very

shy at times so yeah.” An email from Independent Baddies included another introduction from a purported 13-year-old girl.

21. ROATSEY also received emails from the Quora Space “Tesla Drivers.” During the relevant time frame, ROATSEY owned a Tesla vehicle.

22. The Phone additionally contained several screenshots taken from the Quora app and saved on the phone. A screenshot from February 16, 2021, is a post from the Teen Matchmaking Hangout Space depicting an introduction post from a 14-year-old girl and a picture of the minor. Another screenshot from January 1, 2021, depicts the Quora Messages inbox. It shows previews of six different chat conversations, each with a profile picture appearing to depict a teenage girl. One of the girls is labeled as “Bella Rae,” which is also name of the user who created and/or moderates the Independent Baddies Space. A third screenshot shows a screen labeled “Notifications” and lists notifications about posts in Teen Matchmaking Hangout, My~Teen~Chats, and Tesla Drivers. The oldest Quora screenshot was dated in 2019.

23. Evidence from the Phone demonstrates that ROATSEY has posed as a minor on at least one other popular mobile application. The review of the Phone located numerous screen recordings of conversations on the app Snapchat. The conversations appeared to involve communications with minors, one of whom has been identified as being a then-5th grade student at Pinch Elementary School, where ROATSEY was employed prior to his arrest. Per a statement taken from a minor identified in one of the Snapchat recordings, ROATSEY had identified himself as an 18-year-old boy from Ripley, West Virginia. ROATSEY also sent photos of a young man (who has been identified as a popular poster on Instagram) and claimed they were pictures of him.

24. Screen recordings from that same Snapchat account also involve conversations wherein ROATSEY requested and received sexually explicit videos from individuals who appear to be minor females.

CONCLUSION

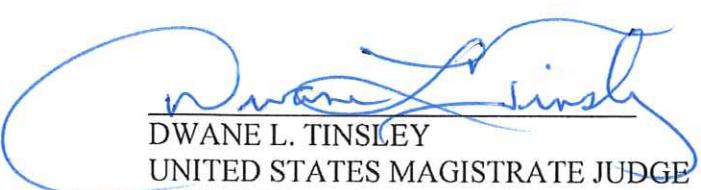
25. Based on the forgoing, I request that the Court issue the proposed search warrant.

26. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant. The government will execute this warrant by serving the warrant on Quora. Because the warrant will be served on Quora, who will then compile the requested records at a time convenient to it, reasonable cause exists to permit the execution of the requested warrant at any time in the day or night.



Terrance L. Taylor
Special Agent
Department of Homeland Security
Homeland Security Investigations

Sworn to by the Affiant telephonically in accordance with the procedures of Rule 4.1 this
8th day of February, 2022.


DWANE L. TINSLEY
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF WEST VIRGINIA